

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

PLAINTIFF CV1 MOTHER, as Next Friend of and on
behalf of PLAINTIFF CV1, a Minor Child,

Plaintiffs,

v.

ROCKY SHAY FRANKLIN, an individual;
MINDGEEK S.A.R.L., a foreign entity; MG
FREESITES, LTD, d/b/a "PORNHUB", a foreign
entity; MG FREESITES II LTD, a foreign entity;
MINDGEEK USA, INCORPORATED, a Delaware
corporation; MINDGEEK CONTENT RT LIMITED, a
foreign entity; 9219-1568 QUEBEC INC. d/b/a
MINDGEEK, a foreign entity; MG BILLING LTD, a
foreign entity; MG CY HOLDINGS LTD, a foreign
entity,

Defendants.

Civil action No. 2:22-cv-0605

**CORPORATE DISCLOSURE STATEMENT OF DEFENDANTS MINDGEEK S.Á.R.L.,
MG FREESITES LTD, MINDGEEK USA INC., MG FREESITES II LTD, MG
CONTENT RT LTD, 9219-5618 QUEBEC INC., MG BILLING LTD & MG CY
HOLDINGS LTD**

This Corporate Disclosure Statement is filed on behalf of Defendants MindGeek S.à.r.l., MindGeek USA Inc., MG Freesites Ltd, MG Freesites II Ltd, MG Content RT Ltd, 9219-1568 Quebec Inc., MG Billing Ltd, and MG CY Holdings Ltd in compliance with the provisions of Federal Rule of Civil Procedure 7.1.

MindGeek S.à.r.l. hereby declares that it is the ultimate parent of Defendants MG Freesites Ltd, MindGeek USA Inc., 9219-1568 Quebec Inc., MG Billing Ltd, and MG CY Holdings Ltd.

There is no publicly held corporation that owns 10% or more of MindGeek S.à.r.l.'s equity interests.

MindGeek USA Inc. hereby declares that its ultimate parent is MindGeek S.à.r.l. There is no publicly held corporation that owns 10% or more of MindGeek USA Inc.'s stock.

MG Freesites Ltd hereby declares that its ultimate parent is MindGeek S.à.r.l. There is no publicly held corporation that owns 10% or more of the equity interests of MG Freesites Ltd.

9219-1568 Quebec Inc. hereby declares that its ultimate parent is MindGeek S.à.r.l. There is no publicly held corporation that owns 10% or more of the stock of 9219-1568 Quebec Inc.

MG Billing Ltd hereby declares that its ultimate parent is MindGeek S.à.r.l. There is no publicly held corporation that owns 10% or more of the equity interests of MG Billing Ltd.

MG CY Holdings Ltd hereby declares that its ultimate parent is MindGeek S.à.r.l. There is no publicly held corporation that owns 10% or more of the equity interests of MG CY Holdings Ltd.

MindGeek S.à.r.l. declares that it was previously the ultimate parent of MG Content RT Ltd, that MG Content RT Ltd ceased operations on December 31, 2018, and that MG Content RT Ltd has been dissolved. There is no publicly held corporation that owned 10% or more of the equity interests of MG Content RT Ltd.

MindGeek S.à.r.l. declares that it was previously the ultimate parent of MG Freesites II Ltd and that that entity was dissolved in December 2020. There is no publicly held corporation that owned 10% or more of the equity interests of MG Freesites II Ltd.

These representations are made to enable the Court to evaluate possible disqualification or recusal. Defendants reserve their right to supplement this Certificate subject to the discovery of

any applicable additional information as the case proceeds. A supplemental disclosure statement will be filed upon any change in the information provided herein.

DATED: February 10, 2023

Respectfully submitted,

/s/ Sara M. Turner

Sara M. Turner

BAKER, DONELSON, BEARMAN, CALDWELL &
BERKOWITZ, PC

smtturner@bakerdonelson.com

Shipt Tower

420 20th Street North

Suite 1400

Birmingham, AL 35203

Phone: (205) 250-8316

Kathleen N. Massey (*pro hac vice* application
forthcoming)

DECHERT LLP

kathleen.massey@dechert.com

Three Bryant Park

1095 Avenue of the Americas

New York, NY 10036

Phone: (212) 698-3500

Attorneys for MindGeek Defendants